



The Otter Project

www.otterproject.org

April 16, 2008

Mayor Susan Golding
Chair, MLPA Blue Ribbon Task Force
C/O California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, California 95814

Dear Chair Golding, Task Force Members, and Staff:

The Otter Project supports Package 4 for the North Central Coast. Given our history and involvement with the South Central Coast, I would imagine our support for Package 4 would be expected - but we have very specific reasons for our support.

From south to north:

A strong Fitzgerald SMR component is critical to the success of the south Central Coast. It is a very long way between the Año Nuevo SMCA and Fitzgerald. As Año Nuevo SMCA is relatively small (compromised by the FG Commission after it left the BRTF), Fitzgerald becomes the 'anchor' for the region. Fitzgerald SMR must be big and must include high-relief rocky habitat.

You should avoid Package 2-XA's solution for the Fitzgerald cluster. As we are finding on the South Central Coast, having enforcement, monitoring, and interpretation partners on the land-side may be critical to an area's success. Package 2-XA moves the SMR portion to the northern part of the cluster, away from the watchful eyes of rangers and the interpretation of local docents. Package 2-XA just doesn't make sense in this area.

Proposal 4 (and 1-3) offers a much better solution in the area between Sea Ranch and Salt Point. Proposal 4 creates a preferred size range SMR in an area of high quality habitat and remote from walk-in access. Package 2-XA places a SMR that exactly spans walk-in access areas frequented by divers and spearfishermen; package 4 avoids most impacts to this very coastal access dependent user group. Package 2-XA appears to punish divers!

Proposal 4 is the strongest proposal for the area near Bodega Head. Not all rock is created equal; relief matters. Package 4 includes in SMR high relief habitat that other



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packages (2-XA) do not. As we have collectively learned more about MPAs (I am now working on MPAs in federal waters), we have learned that "habitat mosaics" are important - those areas with mixed rock and sand and high relief. Monotonous flat rock may 'score' as rock, but is not high quality habitat. The northern portion of the Package 4 Bodega SMR is critical to the area's success.

So what are the metrics to compare packages? I would suggest there are four:

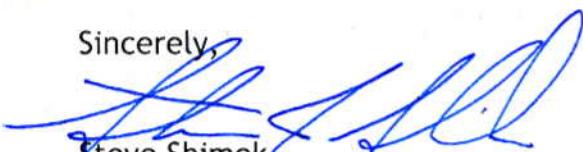
- SAT evaluation. Packages offering greater protection - according to the SAT - should be scored higher than packages with lesser protection.
- Impacts to fishermen. The SAT evaluation must be balanced by negative impacts; a package can be highly protective and cause unnecessary hardship.
- Cross-stakeholder collaboration. Those packages that reached 'across the aisle' should be rewarded because those are the packages that compromised the most. (I can say this with some certainty having been so involved in the South Central Coast).
- Quality of habitat protected. I understand this is new and subjective, but as I learn and practice more, I realize how important the quality of habitat is.

My metric leaves no room for political compromise (this has always been my failing!). But I firmly believe that a package that involved a variety (not number, but variety!) of stakeholders is already compromised. To compromise more for political expediency - at the expense of quality protection - is inadvisable.

Package 4 offers the highest SAT evaluation, essentially the same impact as other packages, was developed by a variety of stakeholders (and is highly compromised); and protects quality habitat.

We hope you will adopt Package 4. Or, we hope you will use package 4 as the basis to build upon.

Sincerely,



Steve Shimek
Executive Director
The Otter Project
Monterey Coastkeeper